

HENRIKSSON -- 09/936,761
Client/Matter: 070051-0283699
11196

IN THE DRAWINGS:

Figure 1 of the drawings has been amended to include the legend "PRIOR ART." An amended version of Figure 1, labeled "Replacement Sheet," is appended to this Amendment.

REMARKS

Claims 1-22 have been amended. Claims 23-25 have been added. No claims have been canceled. Accordingly, after entry of this Amendment, claims 1-25 will remain pending.

As a preliminary matter, the claims have been amended to remove the reference numbers, which were present in the claims upon the filing of this application. The removal of the reference numbers is intended to remove reference to the specific feature(s) recited by the specification. As such, the amended claims are intended to encompass any structure that those skilled in the art would interpret as falling within the scope of the language employed by the claims. To the extent that the scope of the claims is broadened by the removal of the reference numbers, the scope of the claims is intended to be more broad.

In addition, the claims have been amended to remove the phrase "characterized in that," which is a vestige of the claiming structure required for European practice. In each instance, the phrase "characterized in that" has been replaced by the word "wherein," which is recognized under the rules of practice in the United States. To the extent that this substitution broadens the scope of the claims, this result is intended by the substitution.

In the Office Action dated August 12, 2004, the Examiner objected to Figure 1, stating that the figure should include the legend "PRIOR ART." The Applicant has amended Figure 1 to include the legend "PRIOR ART." As a result, the Applicant respectfully requests that the Examiner withdraw the objection to Figure 1.

In the Office Action, the Examiner rejected claims 1-22 under 35 U.S.C. §102(e) as anticipated by Ausems et al. (United States Patent No. 6,434,403). The Applicant respectfully disagrees with the rejection and, accordingly, respectfully traverses same.

Claims 1-22 are patentably distinguishable from Ausems et al. because they recite a method and an apparatus that combine an number of features including, among them, a CPU that controls functions of the mobile station and that connects external devices to the radio section of the mobile station and, in this way, replaces a conventional external CPU as the interface between the external devices and the mobile station. Ausems et al. does not disclose at least these features. Accordingly, Ausems et al. cannot be said to described each and every feature of the claims and cannot be relied upon to anticipate the claims.

Ausems et al. describes a personal digital assistant ("PDA") with a wireless telephone. Figure 2 of Ausems et al. illustrates the components of the PDA telephone 100 in block

diagram form. The PDA telephone 100 “includes a wireless phone engine 210, modem 220, power source 230, display unit 145, input/output (I/O) module 250, smart-card engine 260, short-range transceiver 265, address book 270, GPS engine 275, synchronization circuitry 280, and PDA engine 290.” (Ausems et al. at col. 5, lines 49-54.) The wireless phone engine 210 includes a CPU, a long-range transceiver for transmitting and receiving data, and a digital signal processor for converting between analog and digital data. (Ausems et al. at col. 5, lines 58-61.) The PDA engine 290 includes a CPU 305. (Ausems et al. at col. 7, lines 54-55; Fig. 3.) Accordingly, Ausems et al. describes a PDA telephone 100 that incorporates at least two CPUs, one for the phone engine 210 and one for the PDA engine. The Applicant respectfully submits that neither of the CPUs controls both functions of the telephone and external devices and, thereby, replaces a conventional external CPU as the interface between the external devices and the mobile station, among other features.

In the Office Action, the Examiner states that the CPU of the PDA engine 290 “controls the conventional PDA applications” and likens this to the conventional functions of a mobile station. The Applicant respectfully disagrees with this characterization. The conventional functions of the mobile station include the functions of the radio portion of the mobile station. Nowhere does Ausems et al. describe or suggest that the conventional PDA functions include the radio functions of the device. To the contrary, as discussed above Ausems et al. provides a CPU for the phone engine 210 that is separate from the CPU for the PDA engine 290. Accordingly, Ausems et al. cannot be said to describe a device with a CPU that operates to control both mobile station functions and functions associated with external devices. As a result, the Applicant respectfully submits that Ausems et al. cannot anticipate any of claims 1-22.

In addition, the Applicant respectfully submits that new claims 23-25 also are patentable over Ausems et al. Claim 23 recites a method that combines a number of steps including, for example, controlling functions of the radio section and performing functions that connect the external device to the radio section by means of the CPU. As discussed above, Ausems et al. cannot render claim 23 unpatentable because, at a minimum, the reference does not describe a device with a CPU that operates to control both mobile station functions and functions associated with external devices.

It is respectfully submitted that claim 24 also is patentable over Ausems et al. Claim 24 recites a method combining a number of operations including, among others, storing first, second and third instruction sets in the CPU memory. The first instruction set comprises

instructions for controlling functions of the mobile station; the second instruction set comprises instructions for controlling the radio portion; and the third instruction set comprises instructions for controlling at least one external device. During operation, an interface is established between the mobile device and the at least one external device and the third instruction set is executed by the CPU, thereby exercising control over the at least one external device. As discussed above, Ausems et al. provides no discussion of a method that combines these features. Accordingly, the Applicant respectfully submits that the reference cannot render claim 24 unpatentable.

The Applicant also respectfully points out that claim 25 is patentable over Ausems et al. Claim 25 recites a mobile station that combines several features, including, for example, first, second, and third CPU memory portions operably connected to the CPU for storing first, second and third instruction sets. The first instruction set controls functions of the mobile station; the second instruction set controls the radio portion; and the third instruction set controls at least one external device. During operation, an interface is established between the mobile device and the at least one external device and the third instruction set is executed by the CPU, thereby exercising control over the at least one external device. As discussed above, Ausems et al. provides no discussion of an apparatus that combines these features. Accordingly, the Applicant respectfully submits that the reference cannot render claim 25 unpatentable.

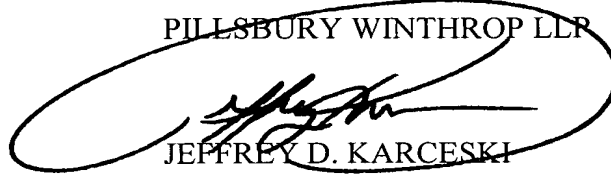
The objections and the rejections having been addressed, the Applicant respectfully submits that the application is in a condition for allowance. Accordingly, the Applicant respectfully requests that the Examiner withdraw the objections and rejections and pass this application quickly to issuance.

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11190

Please charge any fees associated with the submission of this paper to Deposit Account Number 033975. The Commissioner for Patents is also authorized to credit any over payments to the above-referenced Deposit Account.

Respectfully submitted,

PILLSBURY WINTHROP LLP

A handwritten signature in black ink, appearing to read "Jeffrey D. Karciski", is enclosed within a large, hand-drawn oval.

JEFFREY D. KARCESKI

Reg. No. 35914

Tel. No. 703.905.2110

Fax No. 703.905.2500

Date: February 11, 2005
P.O. Box 10500
McLean, VA 22102
(703) 905-2000

Enclosure: Figure 1, labeled as "Replacement Sheet"